



820 West Diamond Avenue, Suite 600  
Gaithersburg, MD 20878  
[www.AdventistHealthCare.com](http://www.AdventistHealthCare.com)

September 11, 2015

Ms. Victoria Wachino  
Deputy Administrator and Director  
Centers for Medicaid and CHIP Services  
Centers for Medicare and Medicaid  
7500 Security Boulevard  
Baltimore, MD 21244-1850

Dear Ms. Wachino:

On behalf of Adventist HealthCare and its member hospitals in Maryland, we are writing to request the approval of the state's applications for an amendment to Maryland's Section 1115 HealthChoice demonstration to provide Medicaid payments for services in non-public Institutions for Mental Disease (IMDs).

Adventist HealthCare's 107-bed IMD in Rockville provides over 6,000 patient days annually to Medicaid patients between the ages of 21 and 64, and is one of the few behavioral health facilities which admit involuntary patients in Montgomery County and the state.

A waiver of the IMD exclusion would allow for equitable treatment and access for Medicaid enrollees with behavioral health and substance abuse needs. This waiver would allow Maryland to reimburse IMDs for the medically necessary treatment of these enrollees.

With the current IMD exclusion, access to medically necessary mental health and substance abuse treatment for these patients will be severely hindered. In addition, without a waiver, these patients will be routed to emergency departments and general acute inpatient units causing negative and costly impacts to the healthcare delivery system that need to be considered. These additional impacts include:

**More expensive care:** Patients who are not able to access medically necessary treatment in an IMD will be forced to seek treatment in high-cost hospital settings that do not have the same level of resources and expertise these individuals require. Unlike general acute hospitals, IMDs have the specialized resources required to treat the underlying problem and not just the acute manifestation of physical symptoms. Treatment of only the acute issue and not the underlying problem will most certainly result in increased readmissions, over-utilization and increased costs for both the Medicaid program and hospitals alike. This consequence is in direct conflict with the goals of the Maryland All-Payer Waiver that seeks to drive down excess utilization while also improving outcomes and the health of the population.

**Longer wait times and thru-put issues.** In the absence of a waiver, patients that present in hospital emergency departments that require psychiatric or substance abuse treatment will not have an IMD available to accept them and will require an inpatient psychiatric bed in a general acute hospital. Not all Maryland hospitals are licensed for inpatient acute psychiatric services. Hospital EDs will be required to hold the patients for longer periods. This will tie up an ED bed and resources that would normally be available much sooner for the treatment of other patients.

**Increased Safety Concerns:** Patients with behavioral health needs require increased monitoring and security protocols. Backlogs in behavioral health patients being held in EDs awaiting placement may require secured ED beds that may not be available, presenting increased safety risks for other patients and staff.



**Substance abuse care:** The Rockville IMD is one of the only facilities in Montgomery County to provide a full continuum of substance abuse, co-occurring and detox inpatient and outpatient services for this population. Without the waiver, there would be a dramatic decrease in access to these services for individuals in Montgomery and surrounding counties.

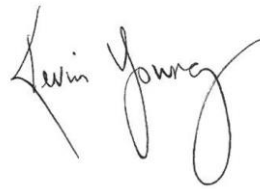
Adventist HealthCare appreciates the opportunity to provide comment on this important issue. The granting of the waiver will enable us to continue providing comprehensive mental health and substance abuse treatment that benefits our patients and our communities.

Please do not hesitate to contact us for additional information or clarification.

Sincerely,



Terry Forde  
President & CEO  
Adventist HealthCare



Kevin Young  
President  
Adventist HealthCare  
Behavioral Health & Wellness Services

